DRAFT CONFORMITY ANALYSIS

Introduction

Federal Transportation Improvement Program

The Federal Transportation Improvement Program (FTIP) is the federally required multimodal list of capital improvement projects to be implemented over a six year period. The biennial FTIP update, produced on an even year cycle, implements the long-range Regional Transportation Plan (RTP). The 2011 FTIP is based on the 2008 RTP and implements the projects and programs included in the fiscal years (2010/11 - 2015/2016) of the 2008 RTP.

Federal Conformity Requirements

Federal and state regulations provide that Southern California Association of Governments (SCAG), as the designated Metropolitan Planning Organization, may rely on a previous regional emissions analysis when processing amendments, in the event that certain conditions are met. The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) and SCAG have identified the following type of 2011 FTIP amendments for which SCAG may rely on the existing regional emissions analysis:

"Category 3. Formal Amendment – Relying on the Existing Conformity Determination.

This amendment may include adding a project or a project phase to the program. This amendment category consists of projects that are modeled and are included in the regional emissions analysis."

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Amendment #11-12 relies on the regional emissions analysis for the 2008 RTP (Amendment #4) and 2011 FTIP as previously amended [Section 93.122(g) is the relevant part of the *Transportation Conformity Regulations* for this amendment.]

FTIP Amendment #11-12 Project Description

FTIP Amendment #11-12 includes six projects for which conformity needs to be reaffirmed (see the Conformity Determination Project Listing). These projects are located within the South Coast Air Basin (SCAB) and Salton Sea Air Basin (SSAB).

Conformity Status of Current FTIP and RTP

The federal conformity determination for the 2008 RTP was approved by the FHWA and FTA on June 5, 2008. The FHWA and FTA also approved conformity findings for Amendment #4 to the 2008 RTP on December 8, 2010.

The conformity determination for the 2011 FTIP received federal approval on December 14, 2010.

SCAG, Final 2011 Federal Transportation Improvement Program Guidelines, September 2009, page 28.



Summary of Conformity Analysis and Findings

SCAG reaffirms the latest applicable conformity findings for both the 2008 RTP and the 2011 FTIP as previously amended, which can be found at: http://www.scag.ca.gov/tcwg/

This reaffirmation covers the findings for all applicable pollutants, including regional emissions analyses, financial constraint test, timely implementation of Transportation Control Measures (TCMs), applying the use of the latest planning assumptions and the latest approved emissions model, reaffirming consistency between the adopted 2011 FTIP and the 2008 RTP as previously amended, and reaffirming the process for interagency consultation and public participation.

SCAG has completed its analysis of the proposed changes to the 2011 FTIP. SCAG's findings for the approval of this amendment are as follows:

Consistency with Current RTP and FTIP

The projects needing conformity reaffirmation in Amendment #11-12 are from the adopted 2008 RTP as previously amended, which is a conforming Plan. Amendment #11-12 does not include any new regionally significant projects beyond those currently included in the 2008 RTP, nor does it move a project across any modeling years currently assumed in the 2008 RTP and 2011 FTIP. Furthermore, the design, concept and scope of the projects do not differ significantly from what was described in the 2008 RTP and 2011 FTIP.

Finding: The 2011 FTIP Amendment #11-12 is consistent with the adopted 2011 FTIP and the 2008 RTP as previously amended.

Regional Emissions Analysis

SCAG is using the regional emissions analysis from the 2011 FTIP as updated by the 2008 RTP Amendment #4. The emissions analysis was performed with the SCAG Regional Transportation Model and utilizes the planning, socioeconomic and model assumptions from the 2008 RTP and 2011 FTIP. FTIP Amendment #11-12 does not result in any modeling changes.

The regional emissions analysis methodology for this amendment to the 2011 FTIP uses currently applicable budgets to determine conformity for all criteria pollutants. Specifically, this conformity determination is being made for all criteria pollutants and precursors in the MDAB, the SCAB, and the SSAB.

Finding: The 2011 FTIP Amendment #11-12 regional emissions for Ozone precursors (NOx, ROG/VOC) are consistent with all applicable emission budgets for all milestone, attainment, and planning horizon years in the MDAB (Los Angeles County Antelope Valley portion and San Bernardino County western portion), the SCAB, the SCCAB (Ventura County portion), and the SSAB (Riverside County Coachella Valley portion and Imperial County portion).

Finding: The 2011 FTIP Amendment #11-12 regional emissions for CO are consistent with all applicable emissions budgets for all milestone, maintenance, and planning horizon years in the SCAB.

Finding: The 2011 FTIP Amendment #11-12 regional emissions for NO₂ are consistent with all applicable emissions budgets for all milestone, maintenance, and planning horizon years in the SCAB.

Finding: The 2011 FTIP Amendment #11-12 regional emissions for PM10 precursors are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years in the SCAB and the SSAB (Riverside County Coachella Valley portion).

Finding: The 2011 FTIP Amendment #11-12 regional emissions for direct PM2.5 and NOx are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years in the SCAB.

Finding: The 2011 FTIP Amendment #11-12 regional emissions for PM10 meet the interim emission test (build/no-build test) for all milestone, attainment and planning horizon years in the MDAB (two nonattainment areas: San Bernardino County portion excluding Searles Valley portion and Searles Valley portion of San Bernardino County) and the SSAB (Imperial County portion).

Finding: The 2011 FTIP Amendment #11-12 regional emissions analysis for PM2.5 and its precursors meet the interim emission test (build/no-build test) for all milestone, attainment and planning horizon years in the SSAB (Imperial County portion).

<u>Timely Implementation of TCMs</u>

Finding: There is one TCM project in the 2011 FTIP Amendment #11-12. However, its project scope and final completion date remain the same. Therefore, the 2011 FTIP Amendment #11-12 does not change timely implementation of the SCCAB and SCAB TCM projects.

Fiscal Constraint Analysis

Finding: FTIP Amendment #11-12 includes the most recent financial plan for the 2011 FTIP. All projects listed in the 2011 FTIP (including the proposed amendment) are financially constrained for all fiscal years.

Interagency Consultation and Public Involvement Analysis

The prior regional conformity analysis leading to FHWA and FTA's approval of the 2011 FTIP complied with all federal and state requirements for interagency consultation and public involvement as documented in Section V of Technical Appendix, Volume II of the 2011 FTIP. For FTIP Amendment #11-12, SCAG will undergo additional public involvement including solicitation via email for comments from the Transportation Conformity Working Group. In addition, Amendment #11-12 will be posted on SCAG's website (www.scag.ca.gov) for a 15-day public comment period.

Finding: The 2011 FTIP Amendment #11-12 complies with all federal and state requirements for interagency consultation and public involvement.

O<u>verall</u>

Finding: SCAG has determined that the 2011 FTIP Amendment #11-12 is consistent with all federal and state requirements and complies with the federal conformity regulations.